

**DRAFT CLASS 3 PERMIT MODIFICATION
HAZARDOUS WASTE STORAGE PERMIT
SAFETY-KLEEN SYSTEMS, INC. - CHANDLER FACILITY
EPA I.D. NO. AZD981969504**

This fact sheet was prepared in accordance with Arizona Administrative Code (A.A.C.) R18-8-271(E)(e) and R18-8-271(G). A fact sheet must accompany every Arizona Hazardous Waste Management Act (AHWMA) draft permit that the Arizona Department of Environmental Quality (ADEQ) has prepared that either raises major issues or involves a new facility. All references to A.A.C. hereafter refer to A.A.C. R18-8-260 et seq., as amended effective December 23, 2019, and as published in Vol 25, Issue 9 Arizona Administrative Register [Page 435], which incorporates and/or modifies parts of Title 40 Code of Federal Regulations (CFR) Parts 260 et seq.

The Arizona Department of Environmental Quality (ADEQ) has prepared a draft Class 3 hazardous waste permit modification for the Safety-Kleen Systems, Inc., (Safety-Kleen) Chandler facility, or Permittee. Safety-Kleen currently operates pursuant to a hazardous waste permit issued on January 27, 2017. The draft Class 3 permit modification 1) provides a closure plan for one of two drum washer units; 2) changes the classification of the remaining drum washer unit from tank to miscellaneous unit; and 3) modifies the remaining drum washer unit to better comply with emissions requirements.

FACILITY DESCRIPTION AND SITE HISTORY

The Safety-Kleen Chandler facility is a commercial hazardous waste storage facility for spent solvents, aqueous-based cleaners, paint wastes, photo imaging wastes and dry cleaning waste collected from off-site generators located within the state of Arizona, mainly the metropolitan Phoenix area. The site includes one building with offices, a warehouse that provides enclosed container storage area (CSA), a tank farm, a loading dock with a solvent return-and-fill station, and two drum washer units attached to the warehouse.

Safety-Kleen currently operates under the Arizona Hazardous Waste Management Act (AHWMA) Permit, issued by ADEQ with an EPA I.D. No. AZD981969504. Safety-Kleen is permitted to store 17,160 gallons of liquid product and waste in containers within the CSA, 11,400 gallons of spent solvent in one vertical hazardous waste storage tank, and 324 gallons of spent solvent in two drum washer units. Safety-Kleen's permit renewal application does not propose any major changes to the facility operation. There are no treatment or disposal units at this site and there are no hazardous waste landfills; waste piles; surface impoundments; land treatment units; or other treatment, storage, and disposal units proposed to be permitted.

TYPES AND QUANTITIES OF HAZARDOUS WASTES MANAGED AT THE FACILITY

Types of Hazardous Wastes Stored

The above-referenced waste streams stored at the facility are hazardous primarily because they contain constituents (designated EPA waste codes are in parenthesis) that are listed as toxic halogenated solvents (F002), ignitable and/or toxic non-halogenated solvents (F003 through F005), or wastes exhibiting the characteristics of ignitability (D001). Other constituents that might exist in these waste streams at toxic concentrations include arsenic (D004), barium (D005), cadmium (D006), chromium (D007), lead (D008), mercury (D009), selenium (D010), silver (D011), benzene (D018), carbon tetrachloride (D019), chlorobenzene (D021), chloroform (D022), o-cresol (D023), m-cresol (D024), p-cresol (D025), total cresol (D026), 1,4-dichlorobenzene (D027), 1,2-dichloroethane (D028), 1,1-dichloroethylene (D029), 2,4-dinitrotoluene (D030), hexachlorobenzene (D032), hexachlorobutadiene (D033), hexachloroethane (D034), methyl ethyl ketone (D035), nitrobenzene (D036), pentachlorophenol (D037), pyridine (D038), tetrachloroethylene (D039), trichloroethylene (D040), 2,4,5-trichlorophenol (D041), 2,4,6-trichlorophenol (D042), and vinyl chloride (D043).

More specific information on the waste types (and waste codes) and storage areas are in the draft hazardous waste permit Sections III.B, "Container Storage", IV.B, "Tank Storage", and V.B; Permit Attachment C, "Waste Analysis Plan"; 40 CFR §261 Subpart C, "Characteristics of Hazardous Wastes"; and 40 CFR §261 Subpart D, "Lists of Hazardous Waste."

Quantity of Hazardous Waste Stored

The amount of hazardous wastes that can be stored in each storage unit at the facility is limited by the secondary containment capacity, the unit size, overfill safety margins, possible container storage configurations and stacking, and flammable and combustible storage limitations. As a result, it has been determined that the warehouse container storage area has a combined total of 17,160 gallons of liquid products and liquid wastes capacity at any time. The aboveground storage tank has a 11,400-gallon operating storage capacity and the one (previously two) drum washer unit has an operating storage capacity of 162 gallons.

PERMIT DESCRIPTION AND STATEMENT OF BASIS

The Permit issued by ADEQ to Safety-Kleen on January 27, 2017, consists of five parts and 12 appendices. All conditions were based on the Resource Conservation and Recovery Act (RCRA) Permit Application dated September 16, 2015, with additional information and revisions dated February 4, 2016; May 20, 2016; and May 31, 2016. The Permit has an expiration date of January 27, 2027.

Permit Part I contains general permit conditions. These conditions are required by Arizona Administrative Code (A.A.C.) R18-8-270.A, as well as Title 40 of the Code of Federal Regulations (CFR) 270.30.

Permit Part II contains general facility conditions. These conditions are required by A.A.C. R18-8-264.A and 40 CFR 270.32.

Permit Part III contains conditions relative to the management of the storage units. This condition is based on the requirements of A.A.C. R18-8-264.A and 40 CFR 264, Subpart I.

Permit Part IV contains conditions relative to the management of the tank unit. This condition is based on the requirements of A.A.C. R18-8-264.A and 40 CFR 264, Subpart J.

Permit Part V currently contains conditions relative to corrective action. Corrective action is authorized by the Arizona Revised Statutes §49-922.B and Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments. The regulatory basis for corrective action can be found in A.A.C. R18-8-264.A and 40 CFR 264.101. This Permit Part is proposed to be changed to *Permit Part VI*.

Proposed Permit Part V contains conditions relative to management of the miscellaneous unit. This condition is based on the requirements of A.A.C. R18-8-264.A and 40 CFR 264, Subpart X

Class 3 Permit Modification – Description of Changes Made to the Permit

The Class 3 Permit Modification makes the following changes to the Permit:

Location within the Permit	Description of Change
Part IV	References to the Drum Washer Units were removed and relocated to a new Part V
Part V	Part V became Part VI and the new Part V now refers to Subpart X – Miscellaneous units. All of draft Part V is a new addition to the permit
Part V	The permittee is closing one Drum Washer Unit, removing the tanks designation and reclassifying the remaining unit as a Miscellaneous Unit under Subpart X as well as modifying the unit to better comply with emissions requirements
Part VI	References to Part V (now Part VI) were updated

VARIANCES REQUESTED BY THE PERMITTEE

None have been requested by the Permittee.

PUBLIC PARTICIPATION PROCESS - PROCEDURES FOR REACHING A FINAL DECISION ON THE PERMIT

The administrative record for the permit modification contains all data submitted by the Permittee. A copy of portions of the administrative record, including the draft modified permit is available for public review at:

Chandler Public Library, Sunset Branch
4930 W. Ray Rd
Chandler, Arizona 85226

The hours of operation are Monday through Thursday: 10.00 a.m. – 8.00 p.m.; Friday and Saturday: 10.00 a.m. - 6.00 p.m; and Sunday from 1.00 p.m. – 5.00 p.m.

The full administrative record is available at:

Arizona Department of Environmental Quality
Records Management Center
1110 West Washington Street, 1st Floor
Phoenix, Arizona 85007
For appointments call: (602) 771-4380

As required by A.A.C. R18-8-271.L and 40 CFR §124.13, all persons, including applicants, who believe any condition of the permit modification or the tentative decision to prepare and issue this permit modification is inappropriate, must raise all reasonably ascertainable issues and submit all reasonably available arguments and supporting materials by the close of the public comment period. All comments submitted during the public comment period shall discuss the appropriateness of the permit modification.

The 45-day public comment period will open on issuance of the public notice on January XX, 2021 and will close on March XX, 2021. During the public comment period, any interested person may submit written comments on the draft permit. These comments and supporting materials must be submitted to ADEQ by the last day of the public comment period to:

Arizona Department of Environmental Quality
Mary Cottrell
Hazardous Waste Permits & Support Unit
1110 West Washington Street
Phoenix, Arizona 85007
E-mail: cottrell.mary@azdeq.gov

All written comments delivered or postmarked by the last day of the public comment period will be considered in ADEQ's final determination regarding the permit modification. After all comments have been considered, a final decision will be made by the Director. The Permittee, each person who has submitted written or oral comments, and each person who has so requested will receive a notice of this final decision. This notice shall include reference to procedures for appealing a decision on the permit modification request. The final decision shall become effective on the date specified in the notice.

At the time the final decision is made, the Director shall also issue a response to any significant comments. The response to comments shall consider all items as specified in A.A.C. R18-8-271.O and 40 CFR §124.17. The response to comments shall be made available to the public for review. Any person who desires to be placed on the mailing list for all future permitting activities for this facility or for facilities in a specific geographic area may request so in writing to the above address, pursuant to A.A.C. R18-8-271.I(c)(1)(ix) and 40 CFR §124.10(c)(1)(ix)(a).

In addition to submitting public comment, any person may request the Director to schedule a public hearing. **Written requests for a public hearing must be submitted to ADEQ by not later than close of the comment period, March xx, 2021 and must state the nature of the issues proposed to be raised in the hearing.** The Director will hold such a hearing if:

- 1) He finds, on the basis of requests, a significant degree of public interest in the permit modification, or
- 2) He finds that the hearing might clarify one or more issues involved in the permit modification decision, or
- 3) A formal written notice of opposition to the permit modification is received within the comment period.

PERSON TO CONTACT FOR ADDITIONAL INFORMATION

For additional information concerning the draft permit, please contact:

Mary Cottrell
Hazardous Waste Permits & Support Unit
1110 West Washington Street
Phoenix, Arizona 85007
E-mail: - Cottrell.mary@azdeq.gov
(602) 771-4168 or Toll Free 1-800-234-5677, extension 771-4168

Hearing-impaired individuals call our TDD line:
(602) 771-4829

Web site: www.azdeq.gov

Any person may request to be put on a mailing list for permit activity. You can make this request to the ADEQ contact person listed above.

Please bring this notice to the attention of anybody who might be interested in this matter.